

REMARKS

The Official Action mailed February 12, 2007, has been received and its contents carefully noted. Filed concurrently herewith is a *Request for One Month Extension of Time*, which extends the shortened statutory period for response to March 12, 2007. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on April 2, 2004; June 30, 2004; October 13, 2004; January 10, 2005; January 27, 2005; March 3, 2005; March 13, 2005; May 17, 2005; October 25, 2005; December 8, 2005; April 26, 2006; and September 18, 2006.

A further Information Disclosure Statement is submitted herewith and consideration of this Information Disclosure Statement is respectfully requested.

Claims 1-84 were pending in the present application prior to the above amendment. Claims 1-30, 43-46 and 72-84 have been canceled without prejudice or disclaimer, and claims 59-71 have been amended to correct the claim dependencies due to the cancellation of claims 1-30, 43-46 and 72-84. Accordingly, claims 31-42 and 47-71 are pending, of which claims 31-42 and 47-58 are independent. Claims 1-43, 45-47, 49-51, 53-55, 57-60, 64, 65 and 72-84 have been withdrawn from consideration by the Examiner (Office Action Summary, Paper No. 20070116). Accordingly, claims 48, 52, 56, 61-63 and 66-71 are currently elected, of which claims 48, 52 and 56 are independent. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

Paragraph 4 of the Official Action objects to the title as not descriptive. In response, the title has been amended as noted above. The amended title is believed to be descriptive of the present invention. Reconsideration of the objection is requested.

Paragraph 5 of the Official Action rejects claims 52 and 62 under 35 U.S.C. § 112, first paragraph, asserting that the "specification fails to disclose that the channel comprises crystalline silicon (See Claim 52); and ... channel comprises microcrystalline

silicon (See Claim 62)" (page 2, Paper No. 20070116). The Applicant respectfully disagrees and traverses the assertions in the Official Action.

A channel forming region comprising crystalline silicon is supported in the present specification, for example, by at least page 12, lines 10-17, and a channel forming region comprising microcrystalline silicon is supported in the present specification, for example, by at least page 11. Therefore, the Applicant respectfully submits that claims 52 and 62, when read in light of the specification, are adequately described and supported in the specification.

Paragraph 6 of the Official Action rejects claims 63 under 35 U.S.C. §112, second paragraph, noting insufficient antecedent basis for "the laser light." In response, claim 63 has been amended to recite "the laser." The Applicant respectfully submits that amended claim 63 is definite.

Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 112 are in order and respectfully requested.

Paragraph 8 of the Official Action rejects claims 44, 48, 66, 70 and 71 as obvious based on the combination of U.S. Patent No. 5,132,821 to Nicholas and U.S. Patent No. 5,268,777 to Sato. The Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in

the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims. Independent claim 48 recites a thin film transistor formed between a pair of flexible substrates with a resinous layer interposed therebetween. For the reasons provided below, Nicholas and Sato, either alone or in combination, do not teach or suggest the above-referenced features of the present invention.

The Official Action asserts that Nicholas discloses "a resinous layer (31)" (page 4, Paper No. 20070116). The Applicant respectfully disagrees and traverses the assertions in the Official Action. Nicholas discloses a continuous layer 31 of silicon dioxide (see column 6, line 18), which is not a resinous layer.

Sato does not cure the deficiencies in Nicholas. Sato is relied upon to allegedly teach flexible substrates (page 4, Paper No. 20070116). However, Nicholas and Sato, either alone or in combination, do not teach or suggest a thin film transistor formed between a pair of flexible substrates with a resinous layer interposed therebetween.

Since Nicholas and Sato do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Paragraph 9 of the Official Action rejects claims 52, 56, 61, 66, 70 and 71 as obvious based on the combination of Nicholas, Sato and U.S. Patent No. 5,894,151 to Yamazaki. The Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness.

Independent claims 52 and 56 also recite a thin film transistor formed between a pair of flexible substrates with a resinous layer interposed therebetween. Please incorporate the arguments above with respect to the deficiencies in Nicholas and Sato. Yamazaki '151 does not cure the deficiencies in Nicholas and Sato. The Official Action relies on Yamazaki '151 to allegedly teach a channel comprising crystalline silicon (page 6, Paper No. 20070116). However, Nicholas, Sato and Yamazaki '151, either alone or in combination, do not teach or suggest the following features or that Nicholas and Sato should be modified to include any of the following features: a thin film transistor formed between a pair of flexible substrates with a resinous layer interposed therebetween. Since Nicholas, Sato and Yamazaki '151 do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.


Paragraphs 10-16 of the Official Action reject dependent claims 62, 63 and 67-69 as obvious based on the combination of Nicholas, Sato and one or more of the following: U.S. Patent No. 5,712,496 to Takahashi, U.S. Patent No. 5,231,297 to Nakayama, JP 62-93974 to Tsunohashi, U.S. Patent No. 4,636,038 to Kitahara, and U.S. Patent No. 5,427,961 to Takenouchi. The Applicant respectfully traverses the rejection because the Official Action has not made a *prima facie* case of obviousness.

Please incorporate the arguments above with respect to the deficiencies in Nicholas, Sato and Yamazaki '151. Takahashi, Nakayama, Tsunohashi, Kitahara and Takenouchi do not cure the deficiencies in Nicholas, Sato and Yamazaki '151. The Official Action relies on Takahashi, Nakayama, Tsunohashi, Kitahara and Takenouchi to allegedly teach the features of the dependent claims. Specifically, the Official Action relies on Takahashi to allegedly teach microcrystalline silicon (page 9, Paper No. 20070116), on Nakayama to allegedly teach XeCl laser light (page 10, *Id.*), on Tsunohashi to allegedly teach a polyimide substrate (*Id.*), on Kitahara to allegedly teach an acrylic resin (page 11, *Id.*), and on Takenouchi to allegedly teach an organic resin

coating comprising acrylic resin (page 12, Id.). However, Nicholas, Sato and Yamazaki '151 and Takahashi, Nakayama, Tsunohashi, Kitahara and Takenouchi, either alone or in combination, do not teach or suggest the following features or that Nicholas, Sato and Yamazaki '151 should be modified to include any of the following features: a thin film transistor formed between a pair of flexible substrates with a resinous layer interposed therebetween. Since Nicholas, Sato and Yamazaki '151 and Takahashi, Nakayama, Tsunohashi, Kitahara and Takenouchi do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,


Eric J. Robinson
Reg. No. 38,285

Robinson Intellectual Property Law Office, P.C.
PMB 955
21010 Southbank Street
Potomac Falls, Virginia 20165
(571) 434-6789